

March 13, 2025

Hon. Kelley B. Hodge
US District Court Judge
ED Pennsylvania
James A. Byrne U.S. Courthouse
601 Market Street
Philadelphia, PA 19106

Re: *Lombardo v. Leonard, et al*; Docket No. 24-cv-01711

Dear Judge Hodge:

We write in response to this Court's March 6, 2025 Order directing Plaintiff to file a response stating his position to Defendant IMS's March 5, 2025 Letter (ECF No. 28) objecting to the letter of Plaintiff dated February 19, 2025 on or before March 13, 2025.

Our position is that (1) this is a moot point now that there is counsel in the case; and (2) the level of specificity requested by IMS would violate attorney-client privilege. We believe IMS is making far too much of this and it is time to move on to the merits of this case. We would be happy to provide additional information to the Court only for in camera review if the Court feels this is necessary.

Very respectfully yours,

/s/Jacob C. Lehman
Jacob C. Lehman
Attorney for Plaintiff